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19 April 2019

Federal Communications Commission
Washington, DC
20554

Re: Comments in Opposition to RM-11831

To whom it may concern,

I am writing to urge the Commission to dismiss filing RM-11831 on three grounds:

a) Adverse impact to emergency response infrastructure and capabilities
b) Existing technologies provide adequate digital mode transparency Part 97.221(c)
c) Sufficient controls exist to minimize or mitigate interference 97.309(a)(4)

I operate an amateur communications gateway that provides several important functions to the local amateur radio and emergency preparedness community:

- HF/VHF gateway to internet email systems for local, remote and maritime traffic.
- HF/VHF standalone email system that is grid independent and forwards via RF to similar nodes providing CONUS coverage.
- APRS gateway and digipeater.
- VHF digipeater.

This system is comprised of publicly available radio, computer, and software systems provided, operated under Part 97, and maintained at my expense as a service to my community. KG7AV is recognized as an AUXCOMM resource for Deschutes County ARES and the Oregon Health Authority Region 7 Emergency Preparedness Program. During emergency response exercises, my system is regularly utilized as part of the critical infrastructure for continuity of communications. Moreover, Deschutes County, and the Redmond Airport (RDM) in particular, have been designated by FEMA as a forward C4I control point in response to an anticipated Cascadia Subduction Zone Event.

The services provided by my system and by peer systems in my region are reliant on technologies that will be severely restricted, if not eliminated altogether, under the provisions of RM-11831. Such restrictions, will, in turn, adversely impact EMCOMM capabilities and efficiency in Central Oregon, undermining years of investment, training, and planning related to continuity of government, public safety, and health care.

The petitioner, I believe, fails to account for these potential impacts, and fails to account for existing technology and features that provide for adequate transparency and control of interference. Those technical arguments have been well presented by ARSFI and other commentors.